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COMMENTS:

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I.1
10/8/97

October 8, 1997

Mr. Thomas Alcamo
U.S. EPA Region 5
77 W. Jackson Blvd. SR-6J
Chicago, IL 60604-3590

RE: Field Modification to Phase I Time-Critical Removal Work Plan for the Master Metals Site

Dear Mr. Alcamo:

This letter is a formal request for field modification of the Phase I Time-Critical Removal Work Plan prepared for the Master Metals Site in Cleveland, Ohio. Enclosed are results of the X-ray fluorescence (XRF) analyzer Extent of Contamination (EOC) survey conducted on site. Also included are diagrams depicting the excavated grids and their location on site. The following paragraphs will provide a brief discussion of current site conditions, results from the XRF EOC survey, and a request for modification of section 5.0 of the Work Plan.

Currently, all on-site areas not covered by a permanent structure have been excavated to a depth of approximately two (2) feet from grade or until fill materials (slag) were encountered. This has resulted in the removal of approximately 2,000 cubic yards of material. Of the fifty (50) total grids excavated, thirty-three (33) contain predominately slag fill, six (6) contain white sludge fill materials, and eleven (11) contain predominately sand. Excavations on site remain open pending approval of this field modification request.

The results from the XRF Extent of Contamination survey can be found in the attached Table 1. The table provides triplicate XRF readings along with the average lead XRF reading for each grid and a description of the grid material. Many grids exhibit highly variable XRF readings. This is due to the heterogenous nature of grid materials. For those eleven grids containing predominately sand materials, the average XRF grid value is 1,586 ppm. However, the average XRF value in the remaining thirty-nine non-sand grids was 8,928 ppm. In addition, the triplicate readings within the slag grids have higher variability among readings.

It is the presence of this heterogenous lead impacted slag fill material that has led to the request for a field modification of the Time-Critical Removal Work Plan. The original workplan scope was to backfill the excavations with native soils and to hydroseed. However, based on lead



concentrations at depth in the slag fill grids, it is premature to backfill and hydroseed before the site-wide lateral extent of contamination has been assessed. The engineering evaluation/cost analysis (EE/CA) support sampling plan will provide the supplemental on-site information required to develop the final site-wide remedial alternative. Therefore, ENTACT is proposing to place polyethylene within the excavations and backfill the areas with sand. This measure will 1) ensure that lead exposure pathways have been mitigated prior to completion of the EE/CA Report, 2) prevent cross-contamination of the clean backfill material, and 3) mitigate any potential subsurface transport of lead.

This request will alter section 5.0 (Site Restoration) of the Work Plan to read the following:

5.0 Site Restoration

Site restoration at the culmination of Phase I activities will include the following:

- placement of 6 mil polyethylene cover over excavated areas
- backfill with a 6 inch sand cover
- decontamination or sealing of remaining cement foundations

5.1 Backfill in Excavated Areas

Following excavation, segregation, and treatment activities open excavations will be covered with 6 mil polyethylene sheeting and backfilled with a 6 inch layer of sand. This sand will be placed in one layer without compaction.

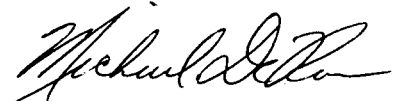
5.2 Decontamination of Cement Foundations

The existing concrete foundation on site will be hydro decontaminated prior to demobilization. Areas not susceptible to decontamination will be sealed with a spray application of concrete sealer.

It is expected that this modification will allow for more expedient and efficient remediation efforts in the future while still eliminating the potential ingestion and inhalation hazards of the lead contaminated material.

If you have any questions or comments, please contact me at (630) 616-2100.

Respectfully,



Michael DeRosa
ENTACT

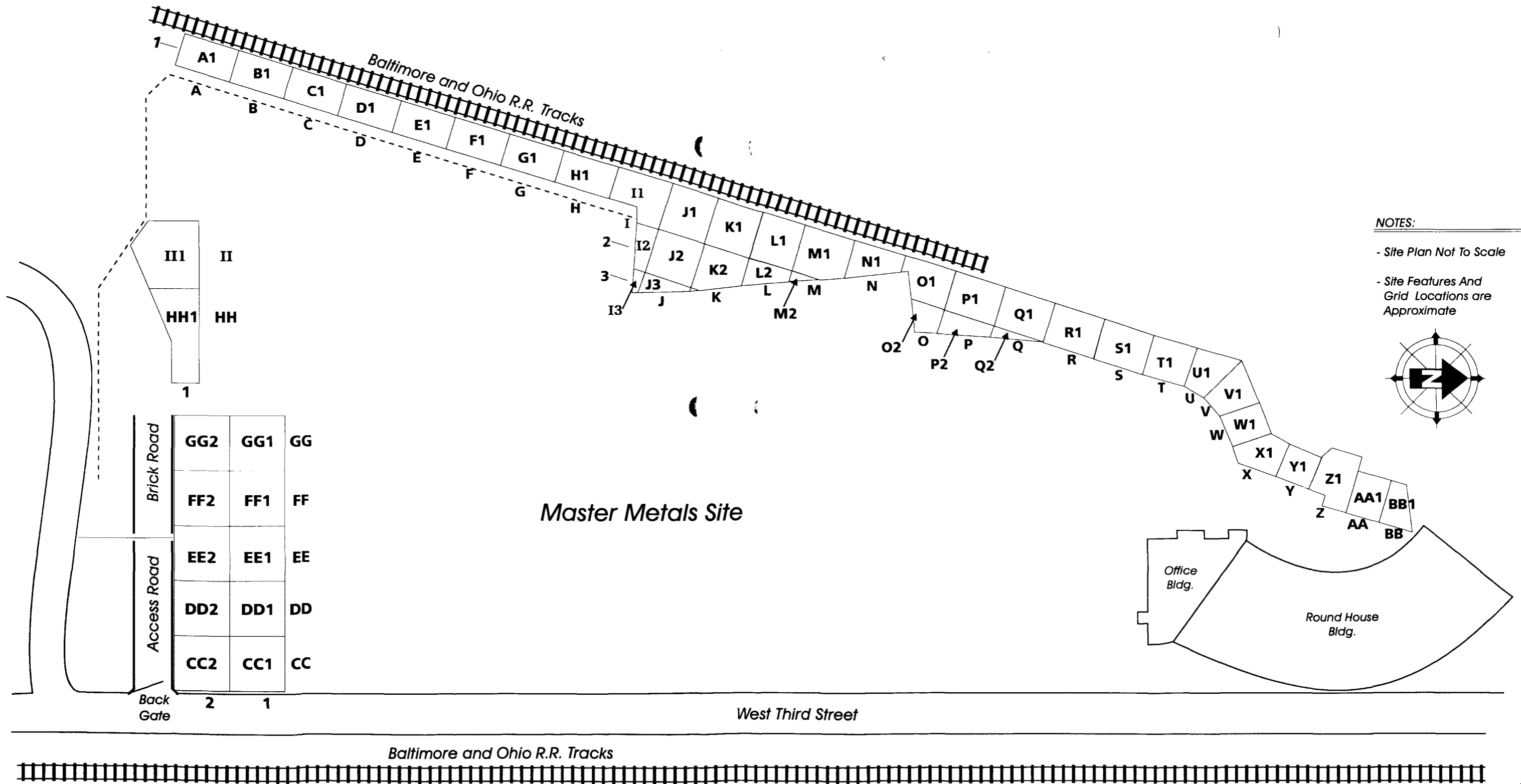
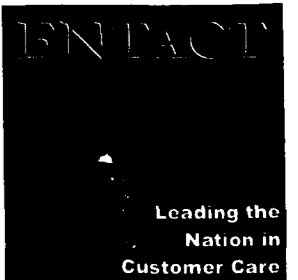
Enclosures

Table 1		XRF Extent of Contamination Survey -- Results			
Grid	Total Lead (ppm)				Description
	1	2	3	average	
A1	310	1300	3570	1727	dk gray slag/ black cinders
B1	3390	35560	39340	26097	dk gray slag/ black cinders
C1	584	985	1699	1089	lt gray slag/ black cinders
D1	15540	26460	14140	18713	lt gray slag/ black cinders
E1	8770	1081	7110	5654	lt gray slag/ black cinders
F1	768	6640	683	2697	lt gray slag/ black cinders
G1	2910	28700	6560	12723	lt gray-rust slag/ black cinders
H1	3530	6650	26370	12183	lt gray-rust slag/ black cinders
I1	767	23730	12590	12362	white sludge
I2	297	4655	19840	8264	dk brown slag
I3	17145	3275	30120	16847	brown, rust slag
J1	766	6220	820	2602	white sludge
J2	185	702	11575	4154	black, dk brown, rust slag
J3	9895	20220	701	10272	black, brown, rust slag
K1	35	58	20910	7001	white sludge
K2	347	3900	30265	11504	black, dk brown, brown slag
K3	62	4414	313	1596	white sludge/ dk brown slag
L1	139	174	698	337	white sludge
L2	31930	14130	59555	35205	gray slag/ gravel
M1	4225	8665	31205	14698	brown, gray slag/ gravel
M2	15510	12945	15415	14623	gray, brown slag
N1	3995	5590	8430	6005	brown slag
O1	6090	15490	4380	8653	black, dk brown, rust slag
O2	26760	5660	15650	16023	brown, gray, rust slag/ gravel
P1	510	1010	3935	1818	brown slag/ gravel, tan coarse sand
P2	14165	19255	7855	13758	gray slag fines/ gravel
Q1	103	2295	770	1056	brown slag/ tan-gray coarse sand
R1	39450	38570	499	26173	white sludge/ lt gray slag/ cinders
S1	2594	25890	5590	11358	white sludge/ dk gray slag/ cinders
T1	388	648	8220	3085	white sludge/ gray cinders

U1	9260	3630	709	4533	white sludge/ gray-black cinders
V1	552	674	4270	1832	brown, rust slag/ cinders
W1	25	2680	4180	2295	black, brown, rust slag
X1	1436	8685	6235	5452	black, brown, rust slag
Y1	5690	4190	123	3334	black, brown, rust slag
Z1	1450	4440	51	1980	black, brown, rust slag
AA1	930	51	25	335	tan coarse sand/ gravel
BB1	481	110	180	257	tan coarse sand/ gravel
CC1	5400	14850	4840	8363	brown coarse sand/ gravel, white-gray slag
CC2	9860	10380	6570	8937	brown coarse sand/ gravel, white-gray slag
DD1	15720	1836	3350	6969	lt brown coarse sand/ gravel
DD2	1596	5000	3020	3205	white-gray slag, brown sand/ gravel
EE1	1720	106	272	699	tan coarse sand/ gravel
EE2	1120	327	380	609	tan coarse sand/ gravel
FF1	740	1716	2506	1654	brown coarse sand/ small gravel
FF2	248	2618	1531	1466	brown coarse sand/ small gravel
GG1	1667	1645	130	1147	brown coarse sand/ small gravel
GG2	178	2586	1104	1289	brown coarse sand/ small gravel
HH1	3425	2028	2068	2757	brown sand/ fine gravel
II1	35	28	742	268	lt brown sand/ fine gravel



Figure I
XRF EXTENT OF CONTAMINATION SURVEY

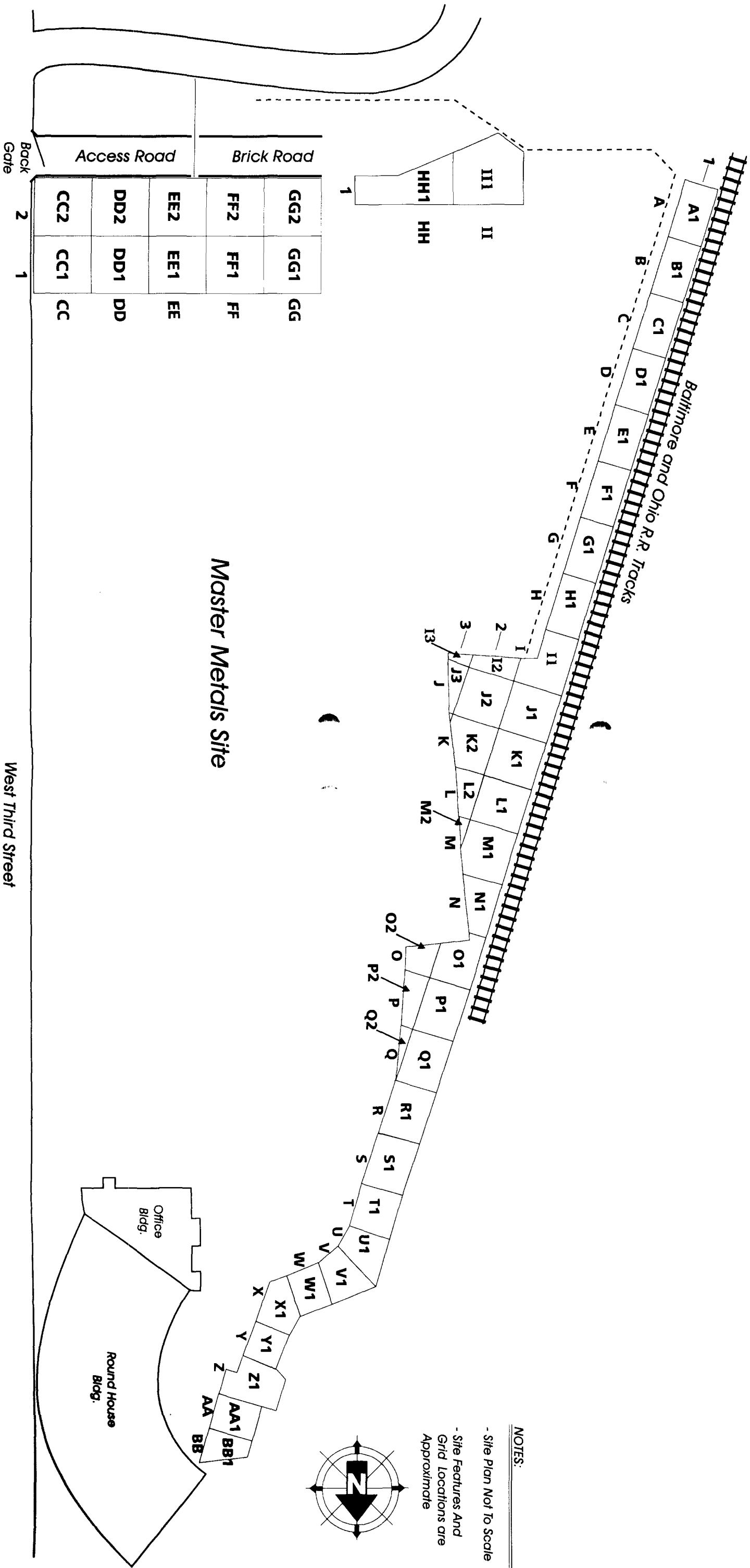
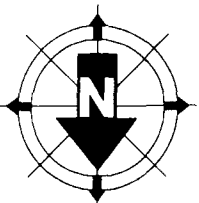


XRF EXTENT OF CONTAMINATION SURVEY

ENTACI
October 8, 1997

NOTES:

- Site Plan Not To Scale
- Site Features And Grid Locations are Approximate



Baltimore and Ohio R.R. Tracks